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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re: WELLS FARGO MORTGAGE
LENDING PRACTICES LITIGATION)

M:08-CV-01930-MMC

This document relates to
ALL ACTIONS

**STIPULATION TO MODIFY
PRETRIAL ORDER ON CASE
MANAGEMENT**

Judge: Honorable Maxine M.
Chesney

WHEREAS, on May 13, 2008, the Court entered the Amended Pretrial
Order on Case Management establishing a pretrial schedule in these MDL
proceedings;

WHEREAS, on May 20, 2008, the Court entered its Order for the parties to
proceed before a private mediator for settlement purposes;

1 WHEREAS, the parties have agreed to proceed to mediation before the Hon.
2 Ronald M. Sabraw (Ret.) of JAMS, who has scheduled an initial mediation session
3 to take place on August 28, 2008;

4 WHEREAS, the parties believe that an adjustment of the existing pretrial
5 schedule extending the deadlines previously established by the Court will facilitate
6 the settlement process and potentially avoid the unnecessary expenditure of the
7 parties' resources;

8 NOW, THEREFORE, the parties stipulate and respectfully request the Court
9 to extend each of the existing pretrial deadlines for a period of 90 days. For the
10 Court's convenience, the parties have lodged a [Proposed] Amended Pretrial Order
11 on Case Management herewith.

12 DATED this 24th day of July, 2008.

13 BONNETT, FAIRBOURN,
14 FRIEDMAN, & BALINT, P.C.

15 /s Andrew S. Friedman

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10 Attorneys for Defendant

11 Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I, Andrew S. Friedman, hereby certify that a true copy of the foregoing document filed through the ECF system will be electronically sent to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those indicated as non-registered participants on July 24, 2008.

/s Andrew S. Friedman
Andrew S. Friedman

- February 9, 2009 Plaintiffs' expert witness reports due for certification issues;
- February 23, 2009 Wells Fargo's rebuttal disclosure and reports for certification issues;
- March 2, 2009 Plaintiffs' rebuttal disclosure and reports for certification issues;
- March 16, 2009 Expert discovery cutoff for certification issues.

4. Class Certification

Plaintiffs' motion for class certification shall be heard on August 6, 2009, at 9:00 a.m. The following briefing schedule shall apply to the class certification motion:

- May 4, 2009 Last day to file motion for class certification;
- June 1, 2009 Last day to file opposition to class certification;
- July 1, 2009 Last day to file reply briefs.

5. Post Class Certification Status Conference

On November 11, 2009 at 10:30 a.m., the Court will hold a post-class certification status conference.

6. Subsequent Discovery

Plaintiffs and Wells Fargo shall adhere to the following schedule for the remainder of discovery:

- February 15, 2010 Fact discovery closes;
- March 16, 2010 Parties' disclosure of initial expert reports;
- April 19, 2010 Parties' disclosure of rebuttal expert reports;
- May 19, 2010 Expert discovery closes.

7. Dispositive Motions

The Court sets the following tentative deadline for dispositive motions;

- June 8, 2010 Last day to file dispositive motions;
- July 12, 2010 Last day to file opposition to dispositive motion;
- August 2, 2010 Last day to file reply.

1 The Court sets a hearing to consider dispositive motions for August 26, 2010.

2 **8. Trial Date**

3 The Court sets October 18, 2010 as a tentative trial date.

4 **SO ORDERED:**

5 Dated:

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Hon. Maxine Chesney
United States District Court Judge
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